

Hecker Fink LLP

350 FIFTH AVENUE | 63RD FLOOR
NEW YORK, NEW YORK 10118

1050 K STREET NW | SUITE 1040
WASHINGTON, DC 20001

TEL (212) 763-0883 | FAX (212) 564-0883

WWW.HECKERFINK.COM

DIRECT DIAL 212.763.0889

DIRECT EMAIL shecker@kaplanhecker.com

March 13, 2025

VIA ECF

Honorable John P. Cronan
United States District Court
Southern District of New York
Daniel Patrick Moynihan
500 Pearl St, Courtroom 12D
New York, New York 10007

Re: United States v. Marianna Levin, 20-cr-681 (JPC)

Dear Hon. Judge Cronan:

We represent Marianna Levin in the above-captioned case and respectfully write, with the consent of the Government, to request a 120-day extension of the deadline for Ms. Levin to satisfy the remaining balance of the forfeiture money judgment imposed by this Court on March 15, 2023. ECF 396.

Ms. Levin was sentenced by Your Honor on Wednesday, February 1, 2023 and began serving a 54-month period of incarceration at FCI Danbury on April 24, 2023. *See* ECF 386. The Court ordered that Ms. Levin was to forfeit to the United States \$1,496,000. Judgement at 7, ECF 363. A Consent Preliminary Order of Forfeiture/Money Judgment (the “Forfeiture Order”) was entered by this Court on March 15, 2023 which included a payment schedule. Forfeiture Order, ECF 396. The Forfeiture Order set forth that Ms. Levin would (1) make a payment to the Government in the amount of \$500,000 to be applied towards the satisfaction of the forfeiture money judgment within thirty (30) days of the entry of the Forfeiture Order (the “Initial Payment”); and (2) make subsequent payments to the Government to satisfy the remaining balance of the forfeiture money judgment within eighteen (18) months of the entry of the Forfeiture Order (the “Remaining Payments”). *Id.* at 2. On September 12, 2024, Your Honor granted Ms. Levin’s request for a six-month extension of the deadline to satisfy the remaining balance of the forfeiture money judgment until March 15, 2025. ECF 568.

As set forth in Ms. Levin’s September 12, 2024 letter to the Court, Ms. Levin is seeking to sell certain real estate assets in order to satisfy the remaining balance of the forfeiture money judgment. ECF 367. This has been an extraordinarily challenging process for Ms. Levin to navigate from FCI Danbury. Ms. Levin has sought the assistance of her family members to effectuate a sale of the relevant real estate assets and has attempted to provide guidance and

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direction to her family members in order to coordinate this process. This too has proven challenging as Ms. Levin's family members have already taken on substantial personal and financial burdens in her absence. Ms. Levin's elderly parents are struggling with increasingly serious health challenges, including depression and, in the case of Ms. Levin's father, persistent urological issues requiring regular medical appointments for chemotherapy. Ms. Levin's husband has maintained his full-time job and simultaneously taken on once-shared family and household responsibilities, including caring for their children as well as Ms. Levin's parents, all while recovering from his own cardiological issues and caring for his own father, who unfortunately passed away last month. Additionally, despite numerous attempts to coordinate with brokers, Ms. Levin's family members are not well equipped to navigate the process of selling real estate assets that have historically been managed and maintained by Ms. Levin. Notwithstanding these challenges, Ms. Levin's family members have worked together to raise \$100,000 to contribute towards Ms. Levin's forfeiture money judgment, which Ms. Levin's husband is in the processing of paying. Ms. Levin has also provided the government with updated financial information.

Despite the best efforts of Ms. Levin and her family members, Ms. Levin will not be in a position to satisfy the entire remaining \$886,000 balance of the forfeiture money judgment by March 15, 2025. Ms. Levin is best suited to effectuate the real estate sale needed to raise funds for the remaining forfeiture money judgment and would benefit from additional time to complete the process. Accordingly, we respectfully request a 120-day extension of the deadline for Ms. Levin to satisfy the remaining forfeiture money judgment imposed by this Court until July 11, 2025. On or before May 12, 2025, we intend to update the Court on Ms. Levin's progress. We appreciate the Court's consideration and are available to discuss, should the Court have any questions.

Sincerely,



Sean Hecker

The request is granted. The deadline for Ms. Levin to satisfy the remaining balance of the Court's March 15, 2023 forfeiture order is extended to July 11, 2025. Defendant shall file a status letter with the Court on Ms. Levin's progress in satisfying her forfeiture obligation by May 12, 2025. The Clerk of Court is respectfully directed to close Docket Number 625.

SO ORDERED.

Date: March 14, 2025
New York, New York



JOHN P. CRONAN
United States District Judge